

Cotton Council Meeting – April 3, 2019

Treated seed petition:

- The Center for Food Safety submitted a petition in 2017 to amend or formally re-interpret 40 CFR 152.25(a) to remove the exemption of coated seeds from FIFRA registration and labeling requirements
- The FRN announcing the agency's receipt of the petition published on 12/20/18. The comment period closed on 3/26/19.
- EPA will review the comments and determine path forward

Acephate:

- Organophosphate registered for use in variety of field (including cotton), fruit and vegetable crops and for non-agricultural uses (ornamental, pasture, turf) and in food handling/institutional settings
- Draft risk assessments (DRAs) published in May 2018
 - Potential significant human health and ecological risks were identified.

- **Deliberative Process / Ex. 5**

Neonics:

- DRAs published in 2016 & 2017
- 1,000,000+ public comments
- Hundreds of effects and exposure studies evaluated
- Revised final risk assessments currently in development

- **Deliberative Process / Ex. 5**

Malathion:

- Key organophosphate pesticide used in National Cotton Boll Weevil Eradication Program (BWEP), which is sponsored by USDA APHIS
- Human health DRA published in 2016
 - Some potential human health risks of concern identified
 - NCC commented that malathion is the only product that can be used to effectively complete eradication of boll weevil in the remaining active zones
- Complete review of recent *in vitro* data and PBPK submission; incorporate as appropriate into revised risk assessment in 2020

- **Deliberative Process / Ex. 5**

- In 2016, EPA initiated consultation with FWS and NIMFS under ESA
 - NMFSs Biological Opinion public comment period closed July 2018; comments are currently being reviewed

Tribufos:

- Organophosphate used prior to harvest, to desiccate and remove the leaves from the cotton bolls, which facilitates mechanical harvesting and increases the quality of the cotton
 - Used on approximately 30-35% of US cotton
- DRAs published in 2016
 - Some potential human health and ecological risks were identified.
- Complete review of recent dermal absorption and *in vitro* data submission; incorporate as appropriate into revised risk assessment in 2020
- **Deliberative Process / Ex. 5**

Paraquat:

- Used prior to harvest, to desiccate and remove the leaves from the cotton bolls, which facilitates mechanical harvesting and increases the quality of the cotton
 - Used on approximately 20% of US cotton
- 2016 Interim Human Health Mitigation Decision:
 - New requirements to address accidental ingestion incidents (including fatalities).
 - Requirements and implementation status:
 - Label changes emphasizing paraquat toxicity and supplemental warning materials (2018)
 - Restricting use of paraquat products to certified applicators (2018)
 - Targeted training materials for paraquat users (released March 2019)
 - Closed system packaging for all non-bulk containers (required in 2020)

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Chlorpyrifos

- EPA concluded that the science addressing neurodevelopmental effects of chlorpyrifos remains unresolved despite several years of study, and further evaluation of the science during the remaining time for completion of

registration review is warranted. We will continue to review the science addressing neurodevelopmental effects of chlorpyrifos.

- EPA has prioritized the re-evaluation of chlorpyrifos, ensuring that the best available science is considered in our decision-making.
- Both EPA's FIFRA Scientific Advisory Panel and USDA had expressed concern with some of the EPA's proposed scientific approaches.

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- I cannot comment further on any pending litigation.

Deliberative Process / Ex. 5

Glyphosate

- EPA's draft human health risk assessment concluded that glyphosate is not likely to be carcinogenic to humans.
- Our assessment found no other meaningful risks to human health when the product is used according to the pesticide label.
- The agency's scientific findings are consistent with the conclusions of science reviews by a number of other countries as well as the 2017 National Institutes of Health Agricultural Health Survey.

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Section 18s

- EPA recertified 8 Section 18s for the use of sulfoxaflor on cotton to control tarnished plant bugs in Alabama, Arkansas, Louisiana, Missouri, Mississippi, Tennessee, Texas and Virginia.

Deliberative Process / Ex. 5

- The sulfoxaflor Section 18s in previous years had the following advisory language concerning bees:
 - "Notifying known beekeepers within 1 mile of the treatment area 48 hours before the product is applied will allow them to take additional steps to protect bees."
 - "...applications should be made before 7:00 am or after 7:00 pm local time...."

- **Deliberative Process / Ex. 5**

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